

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**  
NICOLE DEZOICE

**DEFENDANTS**  
IC SYSTEM, INC.

**(b)** County of Residence of First Listed Plaintiff PHILADELPHIA  
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant \_\_\_\_\_  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

**(c)** Attorneys (Firm Name, Address, and Telephone Number)  
CRAIG THOR KIMMEL, KIMMEL & SILVERMAN, P.C.  
30 EAST BUTLER PIKE, AMBLER, PA 19002  
PHONE: (215) 540-8888 EXT. 116

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                            |                            |   |                            |                            |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
|   | PTF                        | DEF                        |   | PTF                        | DEF                        |
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
15 U.S.C. § 1692 et seq.  
Brief description of cause:  
FAIR DEBT COLLECTION PRACTICES ACT

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** CHECK YES only if demanded in complaint:  
**JURY DEMAND:** ☒ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER 1 FORMTEXT

DATE

SIGNATURE OF ATTORNEY OF RECORD

12/16/2015

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 1508 East Washington Lane, Philadelphia, PA 19138

Address of Defendant: 444 Highway 96 East, St. Paul, MN 55127

Place of Accident, Incident or Transaction: \_\_\_\_\_  
(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?  
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities? Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_ Date Terminated: \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases  
(Please specify) 15 U.S.C. § 1692 et seq.

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases  
(Please specify) \_\_\_\_\_

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, CRAIG THOR KIMMEL, counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE: 12-16-15

\_\_\_\_\_  
Attorney-at-Law

57100

\_\_\_\_\_  
Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 12-16-15

\_\_\_\_\_  
Attorney-at-Law

57100

\_\_\_\_\_  
Attorney I.D.#



**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

NICOLE DEZOICE  
V.  
IC SYSTEM, INC.

CIVIL ACTION

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. (X)
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ( )

12-16-15  
**Date**

  
**Attorney-at-law**

Plaintiff, Nicole Dezoice  
**Attorney for**

215-540-8888 x 116

877-788-2864

kimmel@creditlaw.com

**Telephone**

**FAX Number**

**E-Mail Address**

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**UNITED STATES DISTRICT COURT  
FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

NICOLE DEZOICE,

Plaintiff,

v

IC SYSTEM, INC.,

Defendant.

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**Case No.:**

**COMPLAINT AND DEMAND FOR  
JURY TRIAL**

**(Unlawful Debt Collection Practices)**

**COMPLAINT**

NICOLE DEZOICE ("Plaintiff"), by and through her attorneys KIMMEL & SILVERMAN, P.C., alleges the following against IC SYSTEM, INC. ("Defendant"):

**INTRODUCTION**

1. This is an action for damages brought by an individual consumer for Defendant's violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* ("FDCPA") and the Telephone Consumer Protection Act 47 U.S.C. § 227 *et seq.* ("TCPA").

**JURISDICTION AND VENUE**

2. Jurisdiction of this Court arises under 15 U.S.C. § 1692k(d), which states that such actions may be brought and heard before "any appropriate United

1 States district court without regard to the amount in controversy,” and 28 U.S.C. §  
2 1331, which grants this court original jurisdiction of all civil actions arising under  
3 the laws of the United States.

4 3. Defendant conducts business in the Commonwealth of Pennsylvania;  
5 therefore, personal jurisdiction is established.  
6

7 4. Venue is proper pursuant to 28 U.S.C. §1391(b)(2).

8 **PARTIES**

9 5. Plaintiff is a natural person residing in Philadelphia, Pennsylvania  
10 19138.  
11

12 6. Plaintiff is a “person” as that term is defined by 47 U.S.C. §153(39).

13 7. Plaintiff is a “consumer” as that term is defined by 15 U.S.C. §  
14 1692a(3).  
15

16 8. Defendant is a debt collection company with its headquarters located  
17 at: 444 Highway 96 East, PO Box 64378, St. Paul, Minnesota 55164.

18 9. Defendant is a “person” as that term is defined by 47 U.S.C.  
19 §153(39).  
20

21 10. Defendant is a “debt collector” as that term is defined by 15 U.S.C. §  
22 1692(a)(6), who repeatedly contacted Plaintiff in an attempt to collect a “debt” as  
23 defined by 15 U.S.C. § 1692(a)(5).  
24  
25

1           11. Defendant acted through its agents, employees, officers, members,  
2 directors, heirs, successors, assigns, principals, trustees, sureties, subrogees,  
3 representatives, and insurers.

4                           **FACTUAL ALLEGATIONS**

5  
6           12. Defendant collects, and attempts to collect, debts incurred, or  
7 alleged to have been incurred, for personal, family, or household purposes on  
8 behalf of creditors using the U.S. Mail, telephone and/or internet.

9  
10          13. Upon information and belief, the alleged debt arose out of  
11 transactions for personal, family and/or household purposes.

12          14. Beginning in or around February 2015, Defendant placed repeated  
13 harassing telephone calls to Plaintiff's cellular telephone in its attempts to collect  
14 an alleged debt owed by another person identified as "Anne Knight."  
15

16          14. Upon the parties' initial communication, Plaintiff informed  
17 Defendant that it was calling the wrong person, that "Anne Knight" was her  
18 daughter, that she had her own cellular telephone number and that "Anne Knight"  
19 could not be reached at Plaintiff's cellular telephone number.  
20

21          15. Further, Plaintiff instructed Defendant to stop calling her on her  
22 cellular telephone.

23          16. Defendant acknowledged this information and said "Ok, we're  
24 sorry."  
25

1           17. Plaintiff took further efforts to have her cellular telephone number  
2 removed from Defendant's system by following the telephone prompts to select  
3 the option provided.

4           18. However, Defendant failed to update its records to restrict calls to  
5 Plaintiff's cellular telephone.  
6

7           19. Rather, Defendant continued to call Plaintiff knowing that it was not  
8 the person that owed the alleged debt.

9           20. Defendant called Plaintiff, on average, once a day on her cellular  
10 telephone.  
11

12           21. Defendant's calls originated from the number including, but not  
13 limited to: (307) 316-7474. The undersigned has confirmed that this number  
14 belongs to Defendant.  
15

16           22. Plaintiff has had this cellular telephone number for more than one  
17 year.  
18

19           23. Plaintiff has only used this number as a cellular telephone number.

20           24. The phone number has been assigned to a cellular telephone service  
21 for which Plaintiff incurs a charge for incoming calls.

22           25. Defendant never had consent from Plaintiff to call Plaintiff's cellular  
23 telephone number as Defendant was calling the wrong person.  
24

25           26. Furthermore, upon information and belief, Defendant used an

1 automatic telephone dialing system, automated message and/or prerecorded voice  
2 when contacting Plaintiff.

3 27. Plaintiff knew that she was receiving automated calls and messages,  
4 as Defendant left voicemail messages on her cellular telephone and the message  
5 sounded like an automated recording as it was a computerized voice, not the  
6 voice of a real person.  
7

8 28. Defendant's telephone calls to Plaintiff's cellular telephone were not  
9 made for "emergency purposes."  
10

11 29. Defendant, despite the above, failed to acknowledge its mistake or  
12 notify Plaintiff that its collection activities would cease.

13 30. Upon information and belief, Defendant conducts business in a  
14 manner which violates both the FDCPA and TCPA.  
15

16  
17 **DEFENDANT VIOLATED THE  
FAIR DEBT COLLECTION PRACTICES ACT**

18 **COUNT I**  
19

20 31. Defendant's conduct violated 15 U.S.C. §§ 1692b(3).

21 a. A debt collector violates 1692b(3) of the FDCPA by  
22 communicating with any person other than a consumer more  
23 than once unless requested to do so by such person or unless  
24 the debt collector reasonably believes that the earlier response  
25



1 of such person is erroneous or incomplete and that such person  
2 now has correct or complete location information.

- 3 b. Here, Defendant violated § 1692b(3) of the FDCPA by  
4 communicating with Plaintiff more than once about a debt  
5 belonging to a third party, despite having been notified that it  
6 was calling the wrong person.  
7

8 **COUNT II**

9 32. Defendant's conduct, as detailed in the preceding paragraph,  
10 violated 15 U.S.C. §§ 1692c(a)(1).  
11

- 12 a. A debt collector violates § 1692c(a)(1) of the FDCPA by  
13 communicating with the consumer at any unusual time or place  
14 or a time or place known or which should be known to be  
15 inconvenient to the consumer, including communication  
16 between a debt collector and consumer prior to 8:00 a.m. or  
17 after 9:00 p.m.  
18

- 19 b. Here, Defendant violated § 1692c(a)(1) of the FDCPA by  
20 placing numerous collection calls to Plaintiff to her cellular  
21 telephone about another individual's debt, which was an  
22 inconvenient time or place for Plaintiff to receive collection  
23 calls.  
24  
25

**COUNT III**

33. Defendant's conduct, as detailed in the preceding paragraphs,  
violated 15 U.S.C. §§ 1692d and 1692d(5).

a. A debt collector violates § 1692d of the FDCPA by engaging  
in conduct of the natural consequence of which is to harass,  
oppress, or abuse any person in connection with the collection  
of a debt.

b. A debt collector violates § 1692d(5) of the FDCPA by causing  
a telephone to ring or engaging any person in telephone  
conversation repeatedly or continuously with intent to annoy,  
abuse, or harass any person at the called number.

c. Here, Defendant violated §§ 1692d and 1692d(5) of the  
FDCPA by repeatedly contacting Plaintiff on her cellular  
telephone and continuing to call Plaintiff about a debt of  
another person after being told to stop calling.

**COUNT IV**

34. Defendant's conduct, as detailed in the preceding paragraph, violated  
15 U.S.C. § 1692f of the FDCPA.

a. A debt collector violates § 1692f of the FDCPA by using

1 unfair or unconscionable means to collect or attempt to collect  
2 any debt.

3 b. Here, Defendant violated § 1692f of the FDCPA engaging in  
4 other unfair and unconscionable debt collection practices,  
5 including failing to update its records to cease collection calls  
6 to Plaintiff's cellular telephone.  
7

8  
9  
10 **DEFENDANT VIOLATED THE  
TELEPHONE CONSUMER PROTECTION ACT**

11 **COUNT V**  
12

13 35. Defendant's conduct, as detailed in the preceding paragraphs,  
14 violated the Telephone Consumer Protection Act.

15 36. Under § 227(b)(3)(A) of the TCPA, a person or entity may bring a  
16 private cause of action in an appropriate court based on a violation of the TCPA  
17 or the regulations prescribed under the TCPA to enjoin such violation  
18

19 37. Under § 227(b)(3)(B) of the TCPA, a person or entity may bring a  
20 private cause of action in an appropriate court "to recover for actual monetary loss  
21 from such a violation, or to receive \$500 in damages for each such violation  
22 whichever is greater."  
23  
24  
25

1       38. Despite the fact that Plaintiff never consented to Defendant placing  
2 calls to her, as it was calling the wrong person, Defendant repeatedly placed non-  
3 emergency calls to Plaintiff's cellular telephone.

4       39. Based upon the conduct of Defendant, Plaintiff avers that the  
5 enhancement of damages provided for by the TCPA allowing for Plaintiff to  
6 recover up to \$1,500 per call/violation be applied to calls placed.

7       40. Defendant's conduct violated § 227(b)(1)(A)(iii) of the TCPA by  
8 placing repeated calls using an automatic telephone dialing system to Plaintiff's  
9 cellular telephone without prior express consent.  
10  
11

12  
13       WHEREFORE, Plaintiff, NICOLE DEZOICE, respectfully prays for a  
14 judgment as follows:  
15

- 16       a. All actual damages suffered pursuant to 15 U.S.C.  
17       §1692k(a)(1);  
18       b. Statutory damages of \$1,000.00 for the violation of the  
19       FDCPA pursuant to 15 U.S.C. §1692k(a)(2)(A);  
20       c. All reasonable attorneys' fees, witness fees, court costs and  
21       other litigation costs incurred by Plaintiff pursuant to 15  
22       U.S.C. §1693k(a)(3);  
23  
24  
25



- 1 d. Statutory damages of \$500.00 per telephone call in violation of  
2 the TCPA pursuant to 47 U.S.C. § 227(b)(3)(B);  
3 e. Statutory damages of up to \$1,500 for each call in violation of  
4 the TCPA, pursuant to 47 U.S.C. §§ 227(c)(5)(B) and  
5 227(c)(5)(C), which permits the Court in its discretion to  
6 award such damages if it finds that Defendant willfully or  
7 knowingly violated the TCPA; and  
8  
9 f. Any other relief deemed appropriate by this Honorable Court.  
10  
11

12 **DEMAND FOR JURY TRIAL**

13 PLEASE TAKE NOTICE that Plaintiff, NICOLE DEZOICE, demands a  
14 jury trial in this case.  
15  
16

17 RESPECTFULLY SUBMITTED,  
18

19 Date: 12-16-15

20 By: 

21 CRAIG THOR KIMMEL  
22 Attorney ID No. 57100  
23 Kimmel & Silverman, P.C.  
24 30 E. Butler Pike  
25 Ambler, PA 19002  
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